

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	<b>CASE NO.: 5:19-CR-00720</b>
	)	
<b>Plaintiff,</b>	)	<b>JUDGE PATRICIA A. GAUGHAN</b>
	)	
<b>vs.</b>	)	<b>MOTION TO EXTEND PLEA</b>
	)	<b>AGREEMENT DEADLINE</b>
<b>VERGEIOUS GOULD</b>	)	
	)	
<b>Defendant.</b>	)	

Now comes the Defendant, Vergeous Gould, by and through the undersigned and respectfully moves this Honorable Court to extend the August 31, 2020, plea agreement deadline. The undersigned apologizes in advance for making this request just days before the deadline, however, the parties have been working hard toward a resolution, yet there are still some tasks which need to be completed before the parties can settle the case. The delay in arriving at an amical resolution has been largely due to logistical obstacles (exchanging discovery) associated with COVID 19. The Defendant is requesting that the plea deadline and consequently, all other dates be continued a period of not less than sixty (60) days. This request is not made to unduly delay these proceedings, rather it is to ensure that the Defendant receives a fair trial or disposition of his case. The AUSA does not object to this motion.

Respectfully submitted;  
FERNANDO MACK, L.P.A.

/s/ Fernando Mack, Esq.  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was filed electronically this 28<sup>th</sup> day of August, 2020. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail.

/s/ Fernando Mack, Esq.

**FERNANDO MACK (#0062937)**

*Attorney for Defendant*